

The Atlantic Foundation

January 8, 2025

BY ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Additional Context – Plaintiff’s Letters re Global Settlement
Thompson v. City of New York, et al., No. 22-cv-1458 (JPO) (KHP)

Your Honor:

I represent Plaintiff Kwaine Thompson in the above-captioned matter as *pro bono* counsel. I write to quickly contextualize several letters that Mr. Thompson has mailed to the Court discussing a global settlement, which have been filed on the docket (ECF Nos. 168 & 173), in advance of the upcoming case management conference scheduled for January 23, 2025.

Last month, Plaintiff proposed a global settlement in all of his pending litigation by letter to counsel for defendants in each case.¹ As of yet, none of the defendants have responded, although their deadline to do so (as stated in the letter) is January 20, 2025. I suspect that Mr. Thompson has written to the Court, in the interim, to reiterate his openness to settlement.

Thank you very much for your consideration.

Very truly yours,

/s/ Sami Elamad

cc: Counsel of record (via ECF)

¹ Mr. Thompson has three active cases in this District. *Thompson v. City of New York, et al.*, S.D.N.Y. no. 22-cv-1458 (JPO)(KHP); *Thompson v. Lemon, et al.*, S.D.N.Y. no. 23-cv-2102 (JPO)(KHP); *Thompson v. City of New York, et al.*, S.D.N.Y. no. 21-cv-10371 (JGLC)(BCM).